



Enabling Convergent Technologies''

ORIGINAL

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November 14, 2002

WRITTEN EX PARTE

Ms Marlene H. Dortch  
Secretary  
Federal Communication Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

NOV 14 2002

Re: CC Docket No. 94-102

Dear Ms Dortch:

Attached is a letter that I sent to Thomas Sugrue, Chief of the Wireless Telecommunications Bureau. In accordance with Commission rules, I am filing with you electronically, a copy of that letter and request that it be placed in the record of the proceeding identified above. Please call me if you have any questions related to this filing.

Sincerely,

William J. Todd

Attachment

Cc: Thomas Sugrue  
James Schlichting  
Joel Taubenblatt  
Barry Ohlson  
Blaise Scinto  
Daniel Grosh  
Jennifer Salhus  
Patrick Forster

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November 14, 2002

Mr. Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Re: CC Docket 94-102

Dear Mr. Sugrue:

This letter is to clarify certain points raised by the correspondence to you from Kathleen B. Levitz of BellSouth Corporation, dated November 4, 2002 concerning the above Docket.

The response from BellSouth raises questions in several areas and offers a cautionary note as it relates to wireless carrier access, E2 interface and Bell South's readiness to move forward on full Phase II implementation as defined in CC Docket 94-102. TeleCommunication Systems, Inc. (TCS) will address specific issues noted by BellSouth in the above referenced correspondence as they relate to the company and to our ability to meet E9-1-1 deployment commitments made to our wireless carrier customers.

BellSouth, according to its November 4<sup>th</sup> letter, no longer requires wireless operators to enter into individual contracts to access its Automatic Location Identification (ALI) database. Moreover, designated mobile positioning center (MPC) vendors such as TCS are required to enter into a contractual agreement with BellSouth on behalf of the wireless operator. TCS is in good faith contract discussions with BellSouth on ALI database access and expects to reach agreement shortly. We believe, however, that failure to reach a timely agreement could jeopardize Phase II deployments and thus, the commitments TCS has made to its wireless carrier customers.

TCS must clarify the record on several matters raised by BellSouth in its November 4<sup>th</sup> ex parte correspondence to you. First, TCS never notified BellSouth that the E2 interface it developed had "problems" that would require BellSouth to make changes to the E2 interface as defined in J-STD-036. To the contrary, TCS had completed the development of the J-STD-036, E2 interface in the first half of this year (2002). However, both public safety authorities and TCS' wireless carrier customers recognized that the standard E2 would not support the delivery of Phase I data, including cell site sector location, or the more precise location information associated with Phase II.

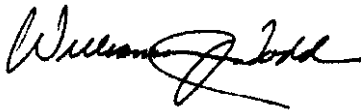
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After much discussion with representatives of all of the stakeholders (i.e., wireless carriers, LECs, public safety and MPC providers), including Intrado, BellSouth's E9-1-1 database provider and administrator, consensus was reached in April to move forward on the development of a revised interface referred to in the industry as "E2+". TCS moved forward on the development of the E2+ interface after being provided the specifications by Intrado and after discussions with Intrado related to this interface. TCS completed development of its connection to this interface in September of this year and successfully performed interoperability testing with Intrado in October.

Second, in the above referenced correspondence, BellSouth indicates they were "required by TCS to make additional enhancements in order to accommodate using XML data format for the E2+. Once again, TCS has never made a request to BellSouth to make any modifications to the E2 or E2+ interfaces. Design and specifications for both of these interfaces was accomplished by TCS in conjunction with Intrado and in accordance with specifications provided by Intrado.

We appreciate this opportunity to clarify the record.

Sincerely,



William J. Todd

Cc: James Schlichting  
Joel Taubenblatt  
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